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July 25, 2016

VIA FEDEX OVERNIGHT

LANCE LUBEL
LUBEL VOYLES
5020 MONTROSE BLVD
SUITE 800
HOUSTON, TX 77006

**Re: *In re National Football League Players' Concussion Injury Litigation*
MDL No. 2323**

Dear Counsel:

As you are aware, the Settlement first announced nearly 3 years ago is at last nearing the completion of its various approvals and reviews, and the effective date may soon be upon us. Though we cannot rule out that the objectors who appealed to the Third Circuit will seek a *writ of certiorari* from the Supreme Court, failing that, the Settlement will become effective at the end of August. As we then begin implementing the Settlement, our clients and the broader class of retired players will begin to benefit from the work and efforts expended on their behalf.

With the Settlement moving into the implementation phase, we now turn our attention to preparing the petition for award of class attorneys' fees and expenses (the "Petition"), as provided in the Settlement Agreement. To facilitate the Petition, please submit to me a time and expense report setting forth your firm's professional time and expenses incurred for the common benefit of all class members. Time and expenses incurred in connection with your representation of individual clients should not be included in your submission. Only post-MDL time incurred through July 15, 2016 should be included in your firm's submission. In the event you have any pre-MDL time and expenses that you maintain contributed to the common benefit of all class members, you can submit those items in an addendum to your primary submission for consideration.

To facilitate a uniform and efficient assembly of time and expense information, please use a spreadsheet that follows the enclosed templates:

New York

Newark

Philadelphia

Exhibit B

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- A report of a full, itemized list of each and every common benefit task with important supporting information.
- A report for total time and fees by task category.
- A report for each expense incurred for the common benefit with important supporting information.

We can also make these templates available to you electronically if you email cbarnes@seegerweiss.com.

Please make sure that the category codes are used for both time and expense submissions and that all supporting invoices and documentation for expenses are presented in the same order they are on the expense template. Accuracy is essential as every time and expense submission may be subject to an audit. Only those submissions made in conformance with the templates and guidelines will be considered.

When you have completed these reports, please submit them along with the supporting expense documentation to Colleen Barnes at cbarnes@seegerweiss.com. These reports need to be submitted on or before August 31, 2016. I will follow up by letter if there is anything else is needed from you for the Petition.

If you have any questions about this, please feel free to contact me.

Very truly yours,



Christopher A. Seeger
Co-Lead Class Counsel

In re National Football League Players' Concussion Injury Litigation

MDI No. 2323

Time and Expense Reporting

Categories: 1. Discovery 2. PSC Calls/Meetings 3. Lead Counsel/PSC Duties 4. Administrative 5. MDL Status Conf. 6. Court Appearance 7. Research 8. Litigation Strategy & Analysis 9. Proceedings/Briefs/Pre-trial Motions/Legal 10. Experts/Consultants 11. Settlement 12. Appeals 13. Miscellaneous (describe)

Firm Name:	
Reporting Period:	

Category Name	Total Time per Category	Total Fees per Category
(1) Discovery	-	\$ -
(2) PSC Calls/Meetings	-	\$ -
(3) Lead Counsel/PSC Duties	-	\$ -
(4) Administrative	-	\$ -
(5) MDL Status Conference	-	\$ -
(6) Court Appearance	-	\$ -
(7) Research	-	\$ -
(8) Litigation Strategy & Analysis	-	\$ -
(9) Pleadings/Briefs/Pre-trial Motions/Legal	-	\$ -
(10) Experts/Consultants	-	\$ -
(11) Settlement	-	\$ -
(12) Appeal	-	\$ -
(13) Miscellaneous (describe)	-	\$ -
Total:	-	\$ -

In re National Football League Players' Concussion Injury Litigation

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Time and Expense Reporting

Firm Name:
Reporting Period: